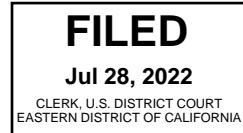


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SEALED

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO. 1:22-cr-00208 JLT-SKO

MOTION AND PROPOSED ORDER TO
SEAL INDICTMENT

GERMAN ANTONIO LOPEZ-
VELASQUEZ, MARKO ANTONIO
LOPEZ, AND LISA MARIE SANTOS

Defendants.

The government moves the Court, pursuant to Rule 6(e) of the Federal Rules of Criminal Procedure, to order and direct that the Indictment returned by the Grand Jury on March 25, 2021 charging the above defendants with violations of 18 U.S.C. § 1349 – Conspiracy to Commit Bank Fraud [Count 1]; 18 U.S.C. § 1344 – Bank Fraud [Counts 2 through 9]; 18 U.S.C. § 1344 – Attempted Bank Fraud [Count 10]; 18 U.S.C. § 1512(b)(3) – Witness Tampering [Count 11]; 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(A), and 28 U.S.C. § 2461(c) – Criminal Forfeiture, be kept secret until the defendants named in this Indictment is either in custody or has been given bail on these offenses; and further order that until such time as the defendants are in custody or has been given bail, that no

1 person shall disclose the finding of the Indictment or any warrants issued pursuant
2 thereto, except when necessary for the issuance and execution of the warrants.
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4 Dated: July 28, 2022

Respectfully submitted,

5 PHILLIP A. TALBERT
6 Acting United States Attorney

7 By /s/ JEFFREY SPIVAK
8 JEFFREY SPIVAK
9 Assistant U.S. Attorney

10 IT IS SO ORDERED.

11 Dated: July 28, 2022

12 B. McAuliffe
13 BARBARA A. MCAULIFFE
14 U.S. Magistrate Judge
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